

VIRGINIA :

IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND
John Marshall Courts Building

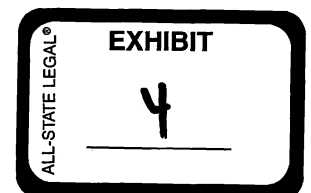
ALAN SCHINTZIUS, et al.,)	
)	
Plaintiffs-Petitioners,)	
v.)	Civil Action No. CL16-3874
)	
J. KIRK SHOWALTER, et al.,)	
)	
Defendants-Respondents.)	

**NOTICE OF FILING OF NOTICE OF REMOVAL
IN THE UNITED STATES DISTRICT COURT**

To: Hon. Edward F. Jewett
City of Richmond Circuit Court
John Marshall Courts Building
400 North Ninth Street
Richmond, Virginia 23219

1. Please take notice that on September 7, 2016, the defendants, J. Kirk Showalter, C. Starlet Stevens, and Cecilia A.B. Dabney, by counsel, filed in the United States District Court for the Eastern District of Virginia, Richmond Division, a Notice of Removal asking that Court to assume jurisdiction over this matter. A copy of the Notice of Removal is attached as **Exhibit A**. As shown by the Certificate of Service below, a copy of this Notice of Filing of Notice of Removal, with Exhibits, has today been served upon the parties and filed with the Clerk, United States District Court for the Eastern District of Virginia, Richmond Division.

2. This notice is given pursuant to 28 U.S.C. § 1446(d), which provides that upon the giving of such notice, the State court shall proceed no further unless and until the case is remanded.

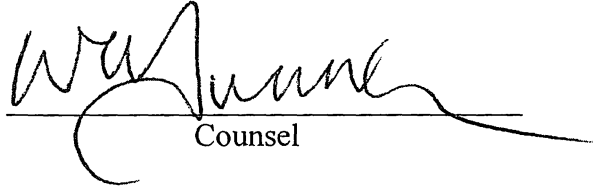


Date: September 7, 2016

Respectfully submitted,

J. KIRK SHOWALTER
C. STARLET STEVENS
CECILIA A.B. DABNEY

By:



Counsel

William W. Tunner (VSB No. 38358)
Michael G. Matheson (VSB No. 82391)
ThompsonMcMullan, P.C.
100 Shockoe Slip, Third Floor
Richmond, Virginia 23219
Tel.: (804) 698-5933
Fac.: (804) 780-1813
wtunner@t-mlaw.com
mmatheson@t-mlaw.com

*Counsel for J. Kirk Showalter, C. Starlet Stevens,
and Cecilia A.B. Dabney*

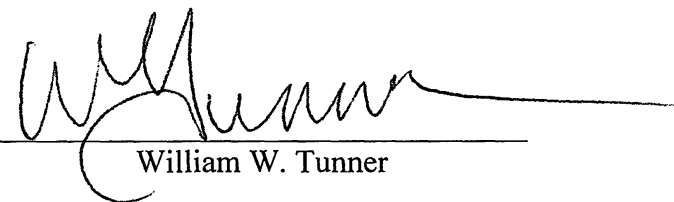
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon the following counsel of record via hand-delivery this 7th day of September, 2016:

Joseph D. Morrissey
Morrissey & Goldman, LLC
605 E. Nine Mile Road
Highland Springs, Virginia 23075
Fax: (804) 737-1671
Counsel for the Plaintiff

William F. Etherington
Beale, Davidson, Etherington &
Morris, P.C.
701 E. Franklin Street #1200
Richmond, Virginia 23219
Fax: (804) 788-0135
wetherington@bealelaw.com
Counsel for Ophelia Daniels

Harold E. Johnson
Williams Mullen
200 South 10th Street, Suite 1600
Richmond, Virginia 23219
Fax: (804) 420-6507
hjohnson@williamsmullen.com
*Counsel for James B. Alcorn, Clara Belle
Wheeler, Singleton B. McAllister, and Edgardo
Cortés*


William W. Tunner